Morgan Lewis

USDC SDNY
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Application GRANTED. No further extensions will be granted absent compelling circumstances. SO ORDERED.

Balane 1885

Barbara Moses, U.S.M.J. April 15, 2020

Melissa C. Rodriguez

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April 15, 2020

VIA ECF

Honorable Magistrate Judge Barbara Moses United States District Court Southern District of New York 500 Pearl St. New York, NY 10007

MEMO ENDORSED

Re: <u>Julian et al. v. Metropolitan Life Insurance Co., No. 17-cv-00957 (AJN)(BCM)</u>

Your Honor:

We represent Defendant Metropolitan Life Insurance Co. ("Defendant") in the above-referenced action. Pursuant to Rules 1(b) and 2(a) of Your Honor's Individual Practices, Defendant writes this letter-motion to respectfully request a two-week extension of time through May 1, 2020 to answer, move, or otherwise respond to Plaintiffs' Third Amended Complaint. Defendant seeks this extension because both Defendant's in-house counsel and outside counsel continue to be inundated with COVID-19 related issues over the past few weeks and requires additional time to provide a fulsome response to Plaintiffs' new allegations in the Third Amended Complaint. Defendant's responsive pleading is currently due on April 17, 2020 per the Court's March 31, 2020 Order. ECF 128. Defendant respectfully requests that the Court extend its time to respond to May 1, 2020. This is Defendant's second request for an extension of time to the stipulated April 3, 2020 deadline to respond to the Third Amended Complaint. Counsel for Plaintiffs consents to this request. If granted, this request for an extension of time will not affect any other scheduled dates in this matter.

Thank You for your consideration.

Sincerely,

/s/ Melissa C. Rodriguez

Melissa C. Rodriguez

Morgan, Lewis & Bockius LLP